

## REMARKS

Entry of the foregoing amendment is respectfully requested. The amendment is believed to place the application in condition for allowance and is, therefore, appropriate under Rule § 116. The amendment does not raise any new issues and, thus, does not require an additional search by the Examiner. The new claim 27 corresponds in scope to the now pending claim 14, which was rewritten to overcome the indefiniteness rejection by the Examiner.

The amendment was not previously presented because the alleged indefiniteness in the claims was not appreciated until set forth in the final Office Action.

By the present amendment, Claim 14 has been canceled. Claims 15-19, 21 and 25 have been amended to eliminate an alleged indefiniteness therein and/or to provide their proper dependency. Claim 27 has been added.

Based on the foregoing amendments and the following remarks the application is deemed to be in condition for allowance and action to that end is respectfully requested.

### **I. Rejection Under 35 U.S.C. § 112**

The Examiner has rejected claims 14-21 and 25 under 35 U.S.C. § 112, second paragraph, for allegedly being indefinite, pointing out specific

language in these claims rendering these claims and claims dependent thereon indefinite. As noted above, claims 15-19, 21 and 25 have been amended to eliminate, among others, the alleged indefiniteness therein.

It is respectfully submitted that claims 15-27 comply with all of the requirements of 35 U.S.C. § 112.

## **II. Rejection Over the Prior Art**

The Examiner has rejected claims 14-21 under 35 U.S.C. § 103(a) as being unpatentable over Mäenpää et al., U.S. Patent No. 5,009,996 (Mäenpää) in view of Simmonds, U.S. Patent Number 3,611,779 (Simmonds ) and Wittkopf, U.S. Publication US 2005/0000263 Wittkopf.

Claims 22-26 were rejected as being unpatentable over Mäenpää in view of Simmonds.

It is respectfully submitted that claims 15-27 are patentable over the cited references. Specifically, claim 27 recites on an operator's side (1b), bringing, in succession, worn-out working roll sets (6) of individual rolling mill stands (2, 3, 4) by separate transversely displaceable carriages (9, 10, 11) a number of which corresponds to a number of rolling mill stands (2, 3, 4) in the rolling mill train (1) and which are displaceable between respective rolling mill stands (2, 3, 4) and a single connection track (14a) leading to a roll workshop (20), onto the connection

track (20) and advancing the worn-out working roll sets (6) by a single locomotive into the roll workshop (20).

The foregoing novel features of the method according to the present invention are not disclosed or suggested in the prior art, including all of the prior art of record in this application. Considering the prior art, Mäenpää does not disclose a roll workshop and a single connection track leading thereto.

In Mäenpää, the item (5) is a storage rack that is provided in front of each rolling mill stand (column 2, lines 32-33).

Further, Mäenpää does not disclose a single locomotive for advancing the worn-out working roll sets. In Mäenpää, the item (16) is a withdrawing device that transfers a roll pair between the roll stand and a roll-replacement car (4) that transfers the roll sets to and from the storage rack (5) (column 3, lines 23-45).

Further, Mäenpää teaches away from using a plurality of transversely displaceable carriages for transferring roll sets to and from separate rolling mill stands (column 1, lines 55-56). In Mäenpää, a sing roll-replacement car is used for transfer of the roll sets between rolling mill stands and respective storage racks (column 3, lines 42-45). Thus, in effect, Mäenpää teaches away from combination of Mäenpää and Simmonds.

In view of the above, it is respectfully submitted that the combination of Mäenpää, Simmonds and Wittkopf is unobvious and even if, *arguendo*, it would have been obvious, it would still lack important and recited features of claim 27.

Under MPEP § 2143 *prima facie* case of obviousness requires that three basic criteria be met.

First, there must be some suggestion or motivation, either in the references or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all of the claim limitation.

It is respectfully submitted that at least the third element of *prima facie* obviousness has not been established.

In view of the above, it is respectfully submitted that a *prima facie* case of obviousness of the present invention as defined by claim 27, over Mäenpää, Simmonds, and Wittkopf has not been made.

It is, therefore, respectfully submitted that claim 27 is patentable over the prior art and is allowable.

Claims 15-21 depend on claim 27 and are allowable for the same reason claim 27 is allowable and further because of specific features recited therein which, when taken alone and/or in combination with those of claim 27, are not disclosed or suggested in the prior art.

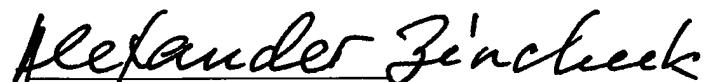
Claims 22-26 recite an installation for carrying out the method of claims 27 and 15-21, rely for their patentability on the same inventive features as claims 27 and 15-21, and are allowable for the same reasons claims 27 and 15-21 are allowable.

## CONCLUSION

In view of the foregoing, it is respectfully submitted that the application is in condition for allowance, and allowance of the application is respectfully requested.

Should the Examiner require or consider it advisable that the specification, claims and/or drawings be further amended or corrected in formal respects in order to place the case in condition for final allowance, it is respectfully requested that such amendment or correction be carried out by Examiner's Amendment and the case passed to issue. Alternatively, should the Examiner feel that a personal discussion might be helpful in advancing this case to allowance, the Examiner is invited to telephone the undersigned.

Respectfully submitted,

  
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